JAN 2 6 1999

Mr. Richard A. Nussbaum, P.E., R.G.
Hazardous Waste Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Mr. Nussbaum:

RE: Comments on Draft RCRA Facility Investigation SWMUs 17, 21, 26, 31, and 10
McDonnell Douglas, Hazelwood, Missouri Facility
EPA I.D. # MOD000818963

The Environmental Protection Agency (EPA) has completed its review of the Draft Resource Conservation and Recovery Act (RCRA) Facility Investigation Report (RFI) for solid waste management units (SWMUs) No. 17, No. 21, No. 26, No. 31 and No. 10 at the McDonnell Douglas Hazelwood Facility. In this correspondence, EPA is providing comments on the Draft RFI.

General Comments

1. The climatological, air quality, and meteorological conditions of the facility are not included in the report. These environmental settings should be included in the RFI Report as stated in Part I of the RCRA Permit.

2. The report does not mention that tetrachloroethene and perchloroethylene (PCE) is the same compound while using both terms in the text. Perchloroethylene (PCE) is used in the text while tetrachloroethene is mostly used in the tables. This inconsistency should be corrected.

3. The report does not discuss the movement of contamination or processes (e.g., attenuation) affecting the contaminants at SWMU 17. However, the report does provide data that can be used to extrapolate contaminant movement and fate. Groundwater direction and relative flow rate are known. The concentration of PCE and its degradation products are also known. Extrapolations on contaminant movement and fate would be useful in development of a Corrective Measures Study Report. Consequently, contaminant movement and fate for SWMU 17 should be addressed.

ARTD/RCAP:JERE.JOHNSON:LH:X7658:1/26/99:MCDCOM.126
RCAP JJ 1-25-99 RCAP
JOHNSON DELASHMIT
JAM 1/27/99

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RCRA RECORDS CENTER

Specific Comments

Section 4.4, Table 4-2. The McDonnell Douglas (MD) Investigation Threshold Level (ITL) (1) for Barium in soil is listed as 1750.0 mg/kg. Tables 7-2, 7-6, 7-7, 7-10, 7-12, and 7-14 list the MD ITL as 1600 mg/kg. This discrepancy should be fixed.

Section 7.2.3, Page 7-5. Paragraph 2. This paragraph states "MW 5 provided analytical data regarding shallow groundwater . . . MW 6 was used to characterize groundwater conditions from a deeper portion of the saturated unit." MW 5 is the deep well while MW 6 is the shallow well as later stated in paragraph 5 of this section, Table 7-3, and Figure 7-1. This discrepancy should be corrected.

Section 7.2.3, Page 7-5, Paragraph 3. This paragraph states that "A downgradient boundary was established to the northeast of SWMU No. 17 where no VOCs were detected from TP-3." Although Temporary Piezometer (TP) 3 is located downgradient to Monitoring Wells 5 and 6, its location is northeast of these monitoring wells. Section 7.2.5. Page 7-7. Paragraph 2 and Figures 7-5, 7-6, and 7-7 show that groundwater flow is toward the east. Since groundwater flow is toward the east, the location of TP-3 might only describe the downgradient boundary of the plume with respect to width. Consequently, the length or eastern boundary of the plume is uncertain. The leading edge of the plume could be located east of the boundary that TP-3 established. Explanation as to why a temporary piezometer was not located directly east of MW 5 and MW 6, or how TP-3 establishes the plume's downgradient boundary should be addressed.

Section 8.4.1, Page. 8-8, Paragraph 1. The end of this paragraph states that CSFs are presented in Tables 8-10, 8-11, and 8-12. These tables are not in the report.

If you have any questions regarding this correspondence, please contact me at (913) 551-7510.

Sincerely,

Jeremy D. Johnson
RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division

bcc: Patricia Murrow, RCAP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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726 MINNESOTA AVENUE
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